

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

JANELLE HILL AND WILLIAM HILL,
INDIVIDUALLY AND AS NEXT
FRIENDS OF SAVANNAH A. HILL,

Plaintiffs,

V.

SANOFI-AVENTIS U.S., INC.,

Defendant.

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Civ. Action No. 1:09-cv-00463-CMH-TRJ

MEDCON, INC.'S PROPOSED MOTION FOR PROTECTIVE ORDER

Medcon, Inc. ("Medcon"), pursuant to Fed. R. Civ. P. 26(c), hereby requests that this Court enter a Protective Order authorizing the disclosure of the confidential Settlement Agreement between Plaintiff Janelle Hill and Defendant Sanofi-Aventis U.S., Inc. in relevant part such that this Court's Order of February 20, 2013 can be effectuated and that Medcon's valid contract, supported by an arbitration award, can be paid.

A memorandum in support of this Motion is attached, as is a copy of the Proposed Order.

Respectfully submitted,

By: /s/
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